

I would personally like to thank the ACCC for its in-depth and considered preliminary report. It makes numerous sound recommendations which will doubtless help transform the digital economy into a more equitable proposition for all Australians.

One area which is conspicuously missing from the Issues Paper put forward in 2018 by the then treasurer is the obvious political and human rights dimensions of the online environment emerging from the explosive and unregulated growth in digital platforms. Specifically these concerns include, however, are not limited to:

1. The impacts and potential ongoing threats to consumer's rights in the wake of the recent Cambridge Analytica scandal, which included reports of the adaptation of commercially available advertising technologies for the deployment of "Informational Weaponry", "Psychological and Cognitive Warfare", and the use of "Fear Based" coercive communication tactics for political and commercial ends. ^[1]
2. Recent reports by Apple CEO Tim Cook on the "weaponisation" of consumer's data. ^[2]
3. The potential impact of Facebook and other digital platform's confirmed capabilities for social engineering and emotional manipulation, first reported in 2014. ^[3]

The consequences of these scandals have exposed commercial practices and systemic vulnerabilities evident in digital platforms, which pose ongoing threats not only to the sovereignty of our country, however to the civil and political rights of consumers specified in the International Covenant on Civil and Political Rights (ICCPR) of which Australia is a signatory.

Specifically the ICCPR mandates:

Article 17

1. *No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honour and reputation.*
2. *Everyone has the right to the protection of the law against such interference or attacks.*

Article 18

1. *Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.*
2. *No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.*

Article 19

1. *Everyone shall have the right to hold opinions without interference.*
2. *Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.*

Possible threats to and contraventions of these rights include:

Article 17

Facebook and other digital platform's practice of mass data collection without the informed consent of consumers, which surely constitutes arbitrary interference with privacy and would be a contravention of article 17 of the ICCPR.

Law enforcement agencies are not sufficiently resourced or educated to deal with instances of people's legal rights being infringed upon, both through traditional cyberattacks or through the concerning practices employed by Cambridge Analytica and other companies. Consumers are therefore not presently offered actionable protection by the law. This should be of ongoing concern for the Digital Platform's Inquiry, given that these acts may in part be predicated on informational asymmetries linked with the commercial data collection practices of the major digital platforms.

Article 18

Confirmed deployment of coercive "fear based" tactics utilised by Cambridge Analytica and other companies for political and economic purposes would surely constitute a violation of Article 18 of the ICCPR. Australians are entitled to legislative protection against the future deployment of such tactics.

Article 19

Australians are entitled to legislative protection against the future deployment of commercial practices in contravention article 19 of the ICCPR. New legislative measures need to be put in place to protect Australian's rights against such practices.

On the following page I have made further suggestions which I hope the ACCC may consider including in it's report.

31/5/2018

To Whom it May Concern,

I'm writing this letter provide the ACCC with a report of information about business practices and behaviours that are of significant concern and may constitute a serious breach of the *Competition and Consumer Act 2010*, as well as areas of civil, criminal and international law.

On 04/04/2018, I provided the ACCC's Digital Platforms Enquiry with copy of a complaint I lodged with Google Australia's Managing Director on 10/4/2017. That complaint involved a matter pertaining to concerning activity involving Google's digital advertising service. Google has not yet provided any resolution or explanation since. The complaint, a copy of which I have attached, is phrased from the perspective of *The Privacy Act (1998)*, however, elements of it pertain to a more serious matter, the details of which I will outline in this report. Given the ACCC's mandate to help small business, of which mine is one, it would appear that advancing this matter in the form of a confidential complaint rather than a publicly available submission to the ACCC's Digital Platforms Enquiry is the most appropriate course of action. I will share this report with them and hope that information resulting from any further investigation into this matter will be made useful for their enquiry.

I would very much appreciate the ACCC's co-operation in providing me with all relevant information resulting from any potential investigation into these business practices and behaviours, all relevant information resulting from the ACCC's ongoing Digital Platforms Enquiry, or any relevant information that the ACCC may already have in it's possession relating to these concerning business practices.

Overview of Concerns:

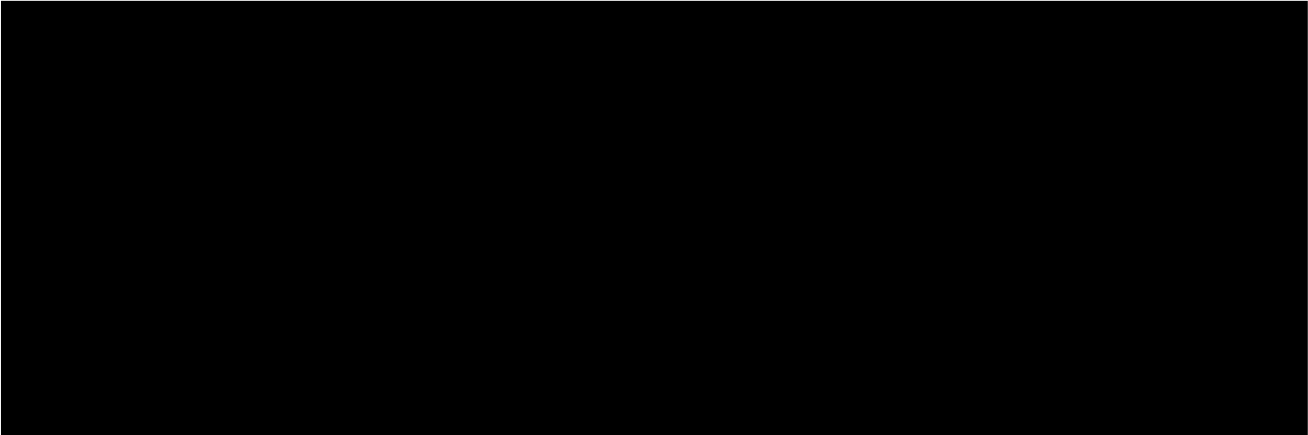
I have recently been advancing a venture aimed at the financing and production of large scale, mainstream Australian British feature films. During the course of starting this venture I formed contractual relations with an very wealthy individual with deep connections in the American family office community and a highly respected Hollywood Executive Producer credited for *Wonder Woman* amongst others. While conducting business dealings both in America and Australia I have had direct intercourse with leading, members of the establishment families of America and the billionaire community, including those connected with the financing of the 2017 election. I have also had interactions with senior members of the current American administration and members of their court.

I will gladly provide detailed evidence of these connections to the ACCC, provided that it remains confidential and does not create any onerous legal liabilities under existing non-disclosure agreements.

During the course of my business dealings, I have observed and reported some deeply concerning phenomena relating to digital advertising. I would regard these events, as I think any other rational person would, to have well and truly transgressed well beyond what might be deemed appropriate, or reasonably necessary in the course of advertising products and services.

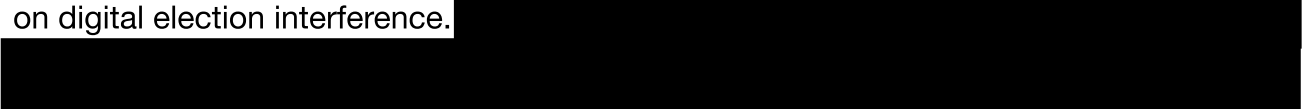
Prior to the Cambridge Analytical revelations in March year, I reported a series of such incidents to the The Attorney General's Cyber Security Response Team (CERT) on 10/11/2017, a number of my colleagues and business partners as well as lodging the report with Google Australia.

My concerns centre on the fact that these advertising messages contained references to highly specific and sensitive medical, legal and other private and personal information. What's more they appeared to be intentionally linked through temporal proximity to my communication and behaviours and contained phonetic, symbolic, visual and conceptual elements shared with those communications and behaviours, as well as linkages with content of a deeply shocking & violent nature, imbuing the string of messages with a profoundly menacing undertone. What's more, I fear these elements may also have reached the people with which I had been doing business.



Given Silent Light Pictures & (Silent Light Media Capital) is a new and very small business I have had extremely limited resources with which to address this matter. Given the politically complex and high stakes nature of the business environment in which I have been dealing and the limited public awareness of the potential use of these tactics, as well as the complete absence of a legal framework with which to address them, it has been both practically and strategically impossible for me to take any form of action to protect my commercial interests.

In the paragraph below, I have written a list of concerns and impacts related to this matter that I would sincerely urge the ACCC to investigate. Some of these area's have been missing from the ongoing enquiries in both the British Parliament and American Congress on digital election interference.



Conceptual Frame Work:

The list below suggests how I believe digital advertising platforms can be adapted to interfere with sensitive digital communication, not only for persuasion but for the purpose of damaging a company's commercial interests

In its investigations into Digital Platforms, it would be prudent for the ACCC to look beyond issues pertaining to privacy and the collection of data. It should in parallel investigate the emergent properties of advertising systems and their potential implications. Specifically an emphasis should be placed on how the sum of the parts of the surveillance and targeting mechanism can be used in combination to achieve ends acting against the best interests of markets, businesses and consumers. An examination of these emergent properties should have a focus on the effects of "soft tactics" like tacit communication.

Targeted advertising messages have the profound ability not only to impact the person or network receiving those messages with respect to how they perceive the product or service being displayed. They also have the ability to impart secondary meaning on that person or network derived from the latent meaning evident from the context in which they are delivered. Specifically if advertisements are placed within close temporal proximity of certain events like an individual's communication, searches, behavioural patterns or the consumption of a piece of content, the placement of seemingly unrelated digital advertising can be used to modify the impression a person receives from that communication, search, behaviour or content or connection.

Advertising images when placed in sequential patterns across time produce an accumulative effect that far out way the power of an individual message. This power is greatly augmented when the sequencing of these messages are contextually aware of details about a person's private communications, their behaviours, relationships, the status of these relationships, aspects of their psychology that formed their foundation and the context in which communications and behaviours have occurred. When combined with precise contextual targeting, strings of malicious advertising can radically modify the intended consequences of digital communication.

Also of potential interest should be an examination of the exploitation of taxonomies and hierarchies and how these can be adapted for the purposes of the modification of digital communication. Of specific interest should be how these taxonomies and hierarchies organising advertising messages can be exploited to create a sense of contextually dependent value when displayed in reaction to certain behaviours. I'd posit that hierarchies and taxonomies can trigger powerful hardwired behavioural responses and exploit innate cognitive vulnerabilities serving to alter the course of a person's or network's decision making in both commercial and social environments.

The ACCC should examine the effects of the re-purposing and exploitation of existing visual and conceptual elements implicit in the design of advertising messages. These elements when adapted for the purpose of modifying communications, can lead to the creation of contextually dependent subtext. Specifically these elements may include but are not limited to embodied metaphors, thematics, innate qualitative connotations linked with prestige, status, price, quality, sexual attractiveness and sexual suggestiveness as well as subtle use of shapes, colours, numbers, words, prices, phonetics and visual similarities to create linkages. When conceptually linked with context and menacing or

obscene material they can create a common through line to the conversation, merging the messages with an accumulative effect.

Beyond the deployment of individual carefully composed and targeted digital advertising images, I believe that the exploitation of the above mentioned emergent properties are extremely, if not more effective for the purposes of enacting the forms of “Cognitive” and “Cultural” warfare described by Cambridge Analytica whistle blower Christopher Wylie. I from my experiences I have attained a clear understanding of their ability to demoralise, harass, cause offence, coerce, intimidate, menace and press upon informational and strategic vulnerabilities in certain business situations, creating an oppressive communications environment controlled in every way by the people exploiting these technologies. This is further augmented when the people with which you are doing business are extraordinarily wealthy and influential.

The application of the tactics described have a direct application to the ACCC and the *The Competition and Consumer Act (2010)* because their adoption among some in the billionaire community like Robert Mercer, clearly have a direct application for interference with markets and implementing unfair trade practices such as boycotts not only for the purpose of for influencing culture, but to gain an unfair economic advantage over their competition. Given Artificial Intelligence and it's applications remain at the very forefront of technology and that their effects for offensive purposes are very difficult to establish they have for some time, I believe, alluded any ramifications for their use.

I have written this report in good faith based off my own experiences. Given that I am a small business and I have no other avenue for recourse, I would certainly appreciate any further information or evidence gathered in response to this report, or resulting from the ACCC's Digital Platform's Enquiry that may help me further.

Relevance of the to *The Competition and Consumer Act 2010 (Cth)*:

In the following pages I will detail the legal implications of interference to communications with respect to the *Competition and Consumer Act 2010*. It should be noted that there are certainly implications in other areas of the law including Civil and Criminal law, The Australian Constitution, International law and Human Rights.

***Competition and Consumer Act 2010 (Cth)*:**

Part IV—Restrictive trade practices

Division 2—Other provisions

i.45DA Secondary boycotts for the purpose of causing substantial lessening of competition.

All listed in 45D.

ii.45D Secondary boycotts for the purpose of causing substantial loss or damage

Hindrance and prevention from, the acquisition and supply of goods through ongoing interference with communication:

Prevention and Hindrance in the Acquisition of:

- Professional relationships
- Financing
- Literary Material for Adaptation
- Literary Material for Production
- Hindrance of Existing Relationships

Prevention and Hindrance in the Supply of:

- Film and Television Projects for Financing.
- Film and Television Projects for Distribution and Exhibition.
- Damage and Loss of Relationships and Reputation.

iii.45DB Boycotts affecting trade or commerce

Given that that these productions were aimed at an international markets and were set for production mostly in Australia, section 45DB would apply with respect to the substantially hinderance caused by interferences with digital communication.

iv.45DC Involvement and liability of employee organisations

45DC is applicable for organisations like Cambridge Analytica is responsible.

v.Australian Consumer Law, Competition and Consumer Act 2010 (Cth):

Section 21 Unconscionable conduct in connection with goods or services

All listed in the Google complaint dated 10/4/ 2017.

Google made to resolve the complaint. (unconscionable given the circumstances)

Conclusion:

I will certainly advance the existing privacy complaint I have lodged with both the Office of the Information Commissioner and make further efforts with Google, however I would certainly appreciate information, insights or evidence you might be able to find along with any recommended avenues for recourse and the future protection of my business endeavours so that I might pursue this in all areas of applicable law.

Thanks kindly in advance for your co-operation with respect to this matter.

Very Best,
Simon Moore

A handwritten signature in blue ink, appearing to be 'Simon Moore', with a stylized, cursive script.

Silent Light Pictures
ABN: 79 281 288 291

Further Matters for Clarification:

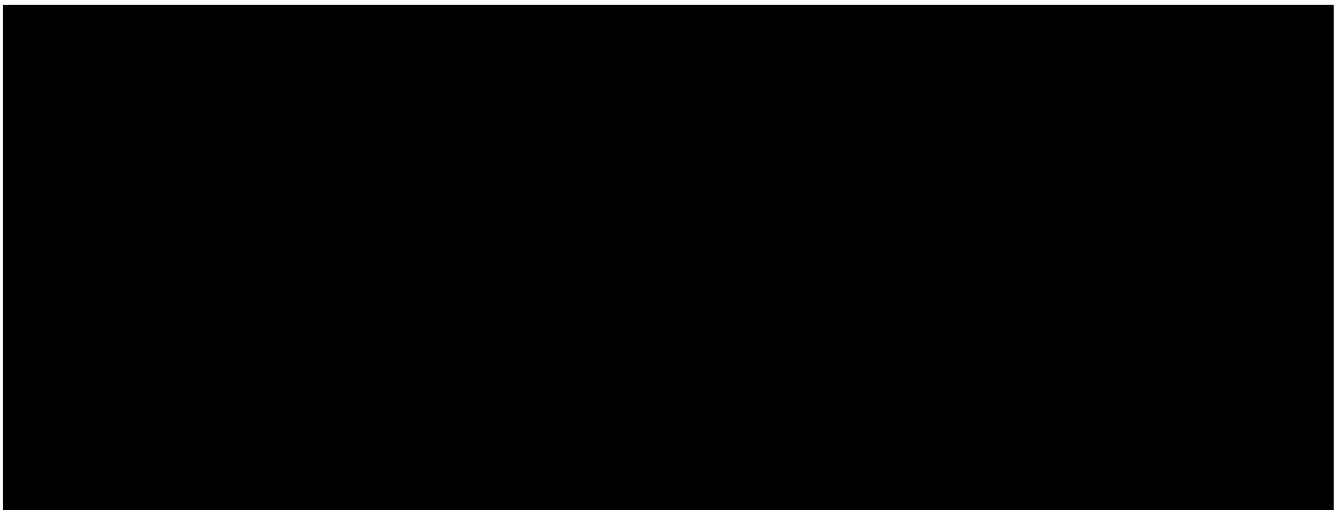


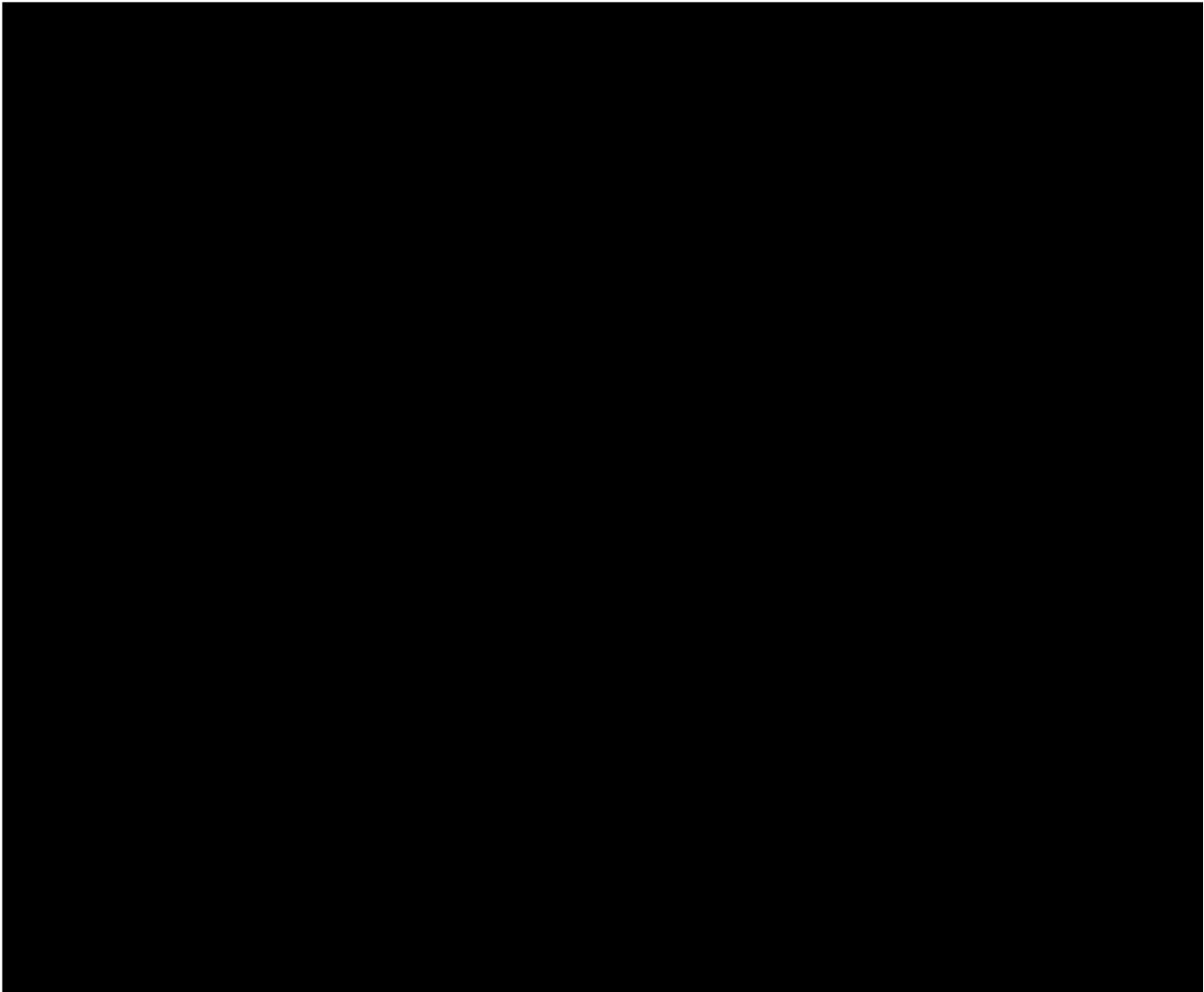
Android devices:

I owned Android devices at the time of the complaint I submitted to Google on 10/4/2017.

Initial Google Complaint:

I phrased my initial complaint to Google from the perspective of a Privacy. I did this because there is a clear existing legal framework protecting Australians from violations of privacy. I maintain the allegations made with respect to Google and the violations of *The Privacy Act (1998)* I reported are indeed valid and should be addressed, however, I chose not to lodge that complaint with the OAIC at the time, or reveal the true extent of its nature, because I feared it might get ignored or dismissed due the complex nature of this complaint accompanied with a lack of public knowledge of the nature of the material detailed in this report.





Suggested Counter Measures against The Emergent Properties of Advertising Systems:

The most direct way to limit the potentially harmful effects of emergent properties of advertising systems and to preserve the digital economy while maintaining people's legal rights is to mandate systems giving consumers the option to select which ads and recommendations they wish to see and allow them the ability to determine where, when and in which order they are shown. This would totally preclude all malicious use of the elements described in this report.

A much stronger legal framework based on principals protecting consumer's commercial and private relationships from systemic technological interventions should be mandated and a further education program for Government agencies like CERT on the potential impacts of behavioural advertising should be considered so they can better help the public in the future.

Adsense Malfunction:

Introduction:

Google Adsense appears to be malfunctioning, resulting in multiple instances of unlawful intrusions of my privacy.

Description of Problems with Google:

- i) Google keeps serving advertising correlated to personal & sensitive information despite my having opted out of ad personalisation, having changed my business email provider & expressly withdrawn consent from Google.**
- ii) Google ads is unresponsive to requests to stop showing certain ads via "Report This Ad".**
- iii) Google's Captcha application is malfunctioning & Google's ads glitch & overlap.**
- iv) Google ads is seemingly deliberately displaying deeply offensive messages based of their setting (News articles on terrorism / murders).**
- v) Ads imitate my online activities using phonetic, symbolic & visual mirroring of my online activities effectively "hacking" & influencing the meaning of my communications, even those conducted via encrypted, non Google services.**

Affixed is Schedule of exhibits giving specific examples of such occurrences.

Schedule i) Examples of Problems Described.

Schedule ii) Communications

Details of these occurrences are described on the following pages.

Legal Violations:

Violations of The Privacy Act of 1998:

In Australia privacy is governed via the Privacy act of 1988 which stipulates APS entities must comply with the APPs (Australian Privacy Principals).

APS Entity Definition:

An APS entity (APS) is defined as all private sector and not-for-profit organisations with an annual turnover of more than \$3 million, all private health service providers and some small businesses (collectively called 'APP entities').

Given that Google has a turnover of more than \$3m, it is an APP entity. It therefore must comply with all APPs.

Breaches of the Privacy Act's APPs:

- i) Not possessing the correct reporting mechanisms for APPs violations.
- ii) Collection of sensitive health information without consent.
- iii) Collection of information without consent.
- iv) Non-Consensual use of sensitive information for the purpose of direct marketing.

APPs Breach i; Not Possessing the Correct Reporting Mechanisms for APPs Violations.

Relevant Legislation, contained in schedule 1 of the privacy act.

Compliance with the Australian Privacy Principles

1.2 An APP entity must take such steps as are reasonable in the circumstances to implement practices, procedures and systems relating to the entity's functions or activities that:

- a. will ensure that the entity complies with the Australian Privacy Principles and a registered APP code (if any) that binds the entity; and*
- b. will enable the entity to deal with inquiries or complaints from individuals about the entity's compliance with the Australian Privacy Principles or such a code.*

Breach:

Google does not have a reporting mechanism for violations of privacy.

Despite phone calls, emails & reports on Google's forums, no Google employee could advise on an appropriate channel for reporting privacy issues with AdSense. All reporting

mechanisms on Google's website are for AdSense publishers & do not provide avenues for non publisher reporting.

Schedule of Exhibits, i Exhibit 1 - Google's AdSense Reporting Mechanism

Google's reporting mechanism contains no option for reporting issues pertaining to privacy violations.

Schedule of Exhibits ii, Exhibit 1, Page 12 - Email with G-suite

G-suite claims they have no means of communication with AdSense.

I called Google's office in Sydney on 21/8/17. An employee, Aubrey, said there was no way of connecting with AdSense, apart from contacting Legal Help.

Schedule of Exhibits ii, Exhibit 3, - Email with G-suite

That email address that Aubrey directed me to, bounced. I found an alternative email address online. Its response suggested that if I had an issue with AdSense I should report it to the Police.

Schedule of Exhibits i, Exhibit 2 - Forum Link

Despite giving notification of the issues, I received no response from Google through Google's AdSense's forum online.

I also made a report on "*AdSense Help - Report a Violation*" with no response.

It is clear to say that from my attempts to contact Google, that there is no clear reporting mechanism for violations of privacy or malfunctions with their ad services.

APPs Breach ii; Collection of Sensitive Health Information Without Consent.

Sensitive Information

3.3 An APP entity must not collect sensitive information about an individual unless:

- a. the individual consents to the collection of the information and:*
 - i. if the entity is an agency — the information is reasonably necessary for, or directly related to, one or more of the entity's functions or activities; or*
 - ii. if the entity is an organisation — the information is reasonably necessary for one or more of the entity's functions or activities; or*
- b. subclause 3.4 applies in relation to the information.*

Division 1—General definitions, Sensitive information

(a) information or an opinion about an individual's:

- (i) racial or ethnic origin; or*
- (ii) political opinions; or*
- (iii) membership of a political association; or*
- (iv) religious beliefs or affiliations; or*
- (v) philosophical beliefs; or*
- (vi) membership of a professional or trade association; or*
- (vii) membership of a trade union; or*
- (viii) sexual orientation or practices; or*
- (ix) criminal record; that is also personal information; or*

- (b) health information about an individual; or*
- (c) genetic information about an individual that is not otherwise health information; or*
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or*
- (e) biometric templates.*

Meaning of health information

The following information is health information:

- (a) information or an opinion about:*
 - (i) the health, including an illness, disability or injury, (at any time) of an individual; or*
 - (ii) an individual's expressed wishes about the future provision of health services to the individual; or*
 - (iii) a health service provided, or to be provided, to an individual; that is also personal information;*
- (b) other personal information collected to provide, or in providing, a health service to an individual;*
- (c) other personal information collected in connection with the donation, or intended donation, by an individual of his or her body parts, organs or body substances;*
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.*

Breach:

Schedule of Exhibits i, Exhibit 3 - Medical Advertisement, GP Services

The advertisement was delivered immediately after a visit to my GP on 12/7/17, a health service.

Despite attempts to remove the advertisement it via Google's "Report this Ad" function the ad continued to display for weeks after my visit.

Seeing this ad made me feel deeply uncomfortable that Google had been surveilling my medical activities & was one of the reasons I decided to discontinue using G-suit.

Given the ferocity with which Google's advertisements follow my other behaviour & the other instances of advertising displayed from sensitive information, it is clear this instance was-non coincidental.

Schedule of Exhibits i, Exhibit 4.1 - Surgical Advertisement

Schedule of Exhibits i, Exhibit 4.2 - Photograph - Me After My Surgery.

The advertising (displayed 21/8/17) depicts an identical medical procedure to the one I was about to receive, a ENT operation aimed at fixing nasal congestion, caused from an injury.

Seeing this offensive ad amplified the anxiety of undergoing general anaesthetic. This was further inflamed by repeated instances of AdSense displaying offensive material shown in "*Issues with faulty AdSense Program - Offensive Material*". Which imbued the material with a menacing undertone.

Schedule of Exhibits i, Exhibit 3.2 - Medical Advertisement - Oxygen Monitor

The purpose of the surgery was to improve breathing through my nose. I also suffer from high blood pressure. The advertisement cycle started in the days proceeding surgery. Given the level of detail it had about my medical condition, it was unquestionably referencing sensitive medical facts.

Breach ii (Section 2.):

Australian Privacy Principle - Consent

An individual may withdraw their consent at any time, and this should be an easy and accessible process. Once an individual has withdrawn consent, an APP entity can no longer rely on that past consent for any future use or disclosure of the individual's personal information. Individuals should be made aware of the potential implications of withdrawing consent, such as no longer being able to access a service.

Consent for Google's use of personal information was withdrawn when I opted out of receiving personalised ads via Google's settings in late June.

I also opted out via Ad Choices for all collection of my data in late June.

Schedule of Evidence ii, Document 1, Page 8

While communicating with Google, I reiterated that I did not consent to Google tracking my online activities.

Even having deleted my G suite account & signed up to an encrypted email service, Proton Mail, Google's cycle's of advertising still seemed to mirror my business communications.

Countless times I attempted communicate my non-consent to certain ads via "Report this Ad" which still remains non-functional.

Google's process for withdrawing consent for the collection of personal & sensitive data is neither easy nor accessible, which is a clear violation of the APPs stance on consent.

APPs Breach iii - Collection of information without consent.

Means of collection

3.5 An APP entity must collect personal information only by lawful and fair means.

APPs specify that collection of personal information is only lawful if an individual consents to the collection of that information.

In accordance with the evidence put forward in Breach i.ii, I did not consent to Google's collection of information was therefore unlawful.

Australian Privacy Principle 6 — use or disclosure of personal information
Use or disclosure

6.1 If an APP entity holds personal information about an individual that was collected for a particular purpose (the primary purpose), the entity must not use or disclose the information for another purpose (the secondary purpose) unless:

- a. the individual has consented to the use or disclosure of the information; or
- b. subclause 6.2 or 6.3 applies in relation to the use or disclosure of the information.

In accordance with the evidence put forward in Breach i.ii I did not consent to Google collecting my information. It was non-consensual & therefore was unlawful.

If Google collects information for improving services, it legally has no right to use that information for advertising, which in the instances of breaches i, ii, iii, & iv, it did.

APPs Breach iv - Non-Consensual use of sensitive information for the purpose of direct marketing.

Exception — sensitive information

7.4 Despite subclause 7.1, an organisation may use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

In accordance with the evidence put forward in Breach ii (Section 2), I did not consent to Google collecting my information. It was not consensual & therefore unlawful.

Schedule of Exhibits i, Exhibit 3 - "Report this Ad" Malfunction

Schedule of Exhibits i, Exhibit 5 - Video evidence of Report this Ad Malfunction

Requesting that Google not display an ad via "Report this Ad" is clearly a withdrawal of consent for Google to display an ad based on sensitive information

Schedule of Exhibits i, Exhibit 6 - Extract, Google's Privacy Policy, Sensitive Information.

Google's Privacy Policy on sensitive information states that Google places restrictions on advertisements based on Sensitive information.

Further Google Issues with faulty Adsense Program:

i) Google's mechanisms for removal & control of advertising non functional:

Schedule of Exhibits i, Exhibit 3 - Report this Ad Malfunction

Schedule of Exhibits i, Exhibit 5 - Video evidence of Report this Ad Malfunction

Schedule of Exhibits i, Exhibit 5 .i - Video evidence of Report this Ad Malfunction

Schedule of Exhibits i, Exhibit 5.1 - Why this Ad? Malfunction

Schedule of Exhibits i, Exhibit 5.1.i - Why this Ad? Malfunction

Schedule of Exhibits i, Exhibit 5.2 - Google's Remove this Ad Policy

Google's "Report this Ad" function does not work. Ads immediately reappear & stay following me constantly across all devices, indefinitely.

Google's "Why this Ad?" does not work. Ads immediately reappear & stay following me constantly across all devices, indefinitely.

ii) Captcha not working:

Schedule of Evidence i, Exhibit 7- Captcha Malfunction

iii) Offensive Content:

Schedule of Evidence i, Exhibit 8.1 - Offensive Content, Justine Damond Murder

Schedule of Evidence i, Exhibit 8.2 - Offensive Content, Manchester Bombing & Indian Flooding deaths.

Ads appear in articles featuring violent or gruesome events, like murders, natural disasters or terrorist attacks, creating cognitive anchors & transferring meaning across the full cycle of advertising, ingraining menacing subtext from the emotional imprints created on their first viewing. Given that ads cannot be removed, via "Report this Ad", it creates a pervasive, inescapable & menacing undertone to all advertising displayed via Google's ads.

iv) AdSense Imitation of Online Activities Using Phonetic Mirroring & Referencing Fragments of Written Communication:

Schedule of Evidence i, Exhibit 9
Schedule of Evidence i, Exhibit 9.1

Google's advertising mirrors all of my online activity. A new event, like a connection on LinkedIn or an email from my business partner or a new business connection will trigger a new advertising cycle or theme, that in some way references that piece of communication phonetically, visually, or with fragments of words from that communication.

If no new communications are present, then advertising remains stuck on previous advertising cycles from, mainly a limited number of fashion advertisements for women's clothing.

v) Advertising Glitching & Overlapping:

Schedule of Evidence i, Exhibit 10 - Ads Overlapping

Ads constantly glitch & video ads play over the top of each-other.

Extrapolation:

From my limited understanding of AI, I'd suggest that AdSense may have developed a interlingua capable of translating written text into patterns of Phonetics, Images & Symbols & It is either autonomously or through a third party manipulation, conveying the same meaning expressed in my written text & online actions in multiple forms of non-written communication, then broadcasting them through Google's advertising network.

Google's surveillance system is maintaining unauthorised access to private & encrypted data & leaking sensitive information through its advertising networks.

The net effect of this is that the meaning of my sensitive & private online activities is subject to manipulation via a malicious version of Google's behavioural targeting system. It would seem that it is attempting to control & interfere with the meaning of my communications through its non-written translation of texts.

I called Apple who advised me to scan my computer for malware using their recommended product, Malware bites, which found no evidence of malware on my computer. The issue is across all of my devices.

Conclusion

Google's AdSense program is unquestionably malfunctioning. It's collecting sensitive information without consent, collecting personal information without consent & delivering direct marketing derived from sensitive information with out consent, not to mention it's instances of displaying offensive content, glitching, malfunctioning, ads mirroring online activities & translating information from text to phonetics, images & symbols.

It is in breach of the following Australian Privacy Act's APPs:

- i) Not possessing the correct reporting mechanisms for APPs violations.
- ii) Collection of sensitive health information with out consent.
- iii) Collection of information with out consent.
- iv) Non-Consensual use of sensitive information for the purpose of direct marketing.

It is extraordinarily reckless that Google would not furnish assistance or even provide a means of communication given the potential consequences of a data breach of this nature.

These intrusions have had broad reaching implications for my business & certainly pose an unacceptable ongoing risk.

I have also found it extremely emotionally distressing having my privacy & dignity infringed upon in such an intrusive manner.

Required Action:

All Google & related companies cease from referencing information about me in any way, including the use of phonetics, visual references, languages or codes, numeric codes or languages, symbolic languages or codes, contextually meaningful references to communications, translations of my communications or data into any other form or language, written, visual or otherwise, other than in its original intended written form.

Cease using patterns or sequencing of advertising & contextual placement of advertising using private or sensitive information about me or my business.

Google cease from displaying offensive material & material linked or thematically correlated with offensive material.

Provide me with all information on the cause & extent of this matter.